

The Honorable David G. Estudillo

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

GABRIELLA SULLIVAN, et al.,

Plaintiffs,

v.

BOB FERGUSON, in his official capacity  
as Washington State Attorney General, et  
al.,

Defendants.

NO. 3:22-cv-05403-DGE

STATE DEFENDANTS' RESPONSE TO  
ALLIANCE FOR GUN  
RESPONSIBILITY'S MOTION TO  
INTERVENE AS A DEFENDANT

State Defendants Attorney General Ferguson and Chief Batiste respectfully submit this response in support of the Alliance for Gun Responsibility's Motion to Intervene as a Defendant (Dkt. # 45).

The State of Washington has been involved in several matters litigating the validity and constitutionality of state statutes proposed and promoted by various sponsors that have intervened to defend the law. *See, e.g., Thorsted v. Gregoire*, 841 F. Supp. 1068 (W.D. Wash. 1994), *aff'd*, 75 F.3d 454 (9th Cir. 1996); *Int'l Ass'n of Indep. Tanker Owners v. Lowry*, 947 F. Supp. 1484 (W.D. Wash. 1996), *aff'd in part, reversed in part sub nom. Int'l Ass'n of Indep. Tanker Owners v. Locke*, 148 F.3d 1053 (9th Cir. 1998), *reversed*, *United States v. Locke*, 529 U.S. 89 (2000); *Washington State Republican Party v. Logan*, 377 F. Supp. 2d 907 (W.D. Wash. 2005), *aff'd sub nom. Washington State Republican Party v. Washington*, 460 F.3d 1108 (9th Cir. 2006), *reversed sub nom.*

1 *Washington State Grange v. Washington State Republican Party*, 552 U.S. 442 (2008); *Washington*  
2 *Ass'n for Substance Abuse & Violence Prevention v. Washington*, 278 P.3d 632 (2012). The State's  
3 experience is that the sponsor's participation is generally constructive.

4 The State Defendants support the Motion to Intervene.

5 DATED this 25th day of July 2022.

6 ROBERT W. FERGUSON  
7 Attorney General

8 /s/ R. July Simpson

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26

**DECLARATION OF SERVICE**

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will send notification of such filing to all counsel of record.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 25th day of July 2022, at Tacoma, Washington.

/s/ R. July Simpson

R. JULY SIMPSON, WSBA #45869

Assistant Attorney General